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JAN 28 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

January 28, 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

COCKET FILE COPY ORIGINAL

RE: In the Matter of Policy and Rules Concerning the Interstate,
Interexchange Marketplace; Implementation of Section 254(g)
of the Communications Act of 1934, as amended

Dear Mr. Caton:

Pursuant to Section 1.429 of the Commission's Rules, attached please find an original and 11 copies of the Comments of the Ad Hoc Telecommunications Users Committee, in the above captioned matter. Please date stamp the additional copy and return it with our messenger.

If you have any questions regarding this filing, please do not hesitate to call.

Sincerely,

Ellen G. Block
Ellen G. Block

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JAN 28 1997

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

)
Policy and Rules Concerning the)
Interstate, Interexchange Marketplace)

)
Implementation of Section 254(g) of the)
Communications Act of 1934, as amended)

DOCKET FILE COPY ORIGINAL

CC Docket No. 96-61

**COMMENTS ON PETITIONS FOR RECONSIDERATION
AND CLARIFICATION**

The Ad Hoc Telecommunications Users Committee, the California Bankers Clearing House Association, the New York Clearing House Association, ABB Business Services, Inc. and The Prudential Insurance Company of America file these comments in opposition to certain petitions for reconsideration -- and in support of others -- concerning the Commission's Second Report and Order ("Order") in the above-captioned proceeding.¹

Of the eleven Petitions filed, only two purport to challenge the heart of the Commission's Order -- the decision to require nondominant interexchange carriers to withdraw their tariffs for interstate interexchange services. See Petition of Frontier Communications, Petition of Telecommunications Resellers

¹ *Policy and Rules Concerning the Interstate, Interexchange Marketplace*, CC Docket 96-61, Second Report and Order, FCC 96-424 (released October 31, 1996), 61 Fed. Reg. 59340 (November 22, 1996). These comments are filed pursuant to the Commission's Public Notice, Report No. 2171 (released January 7, 1997), 62 Fed. Reg. 1755-1756 (January 13, 1997).

Association. These parties largely repeat arguments previously made to -- and rejected by -- the Commission. Only one novel claim has been made -- that the filed rate doctrine is beneficial to customers. See Petition of Frontier Communications at 6 and 10 n.25. That doctrine ensures that whatever clauses the carriers put in their tariffs will "trump" their contracts even if users are not told of (and do not consent to) the new provisions. Frontier's characterization of the doctrine as beneficial to customers is without merit -- and astounding in its audacity.²

The other Petitions raise problems arising from the application of the Order to the bundling of domestic and international calling capabilities,³ the scope of the Commission's disclosure requirement for detariffed services;⁴ and other issues.⁵ We wish to make two points about these matters.

First, we urge the Commission to detariff international services when they are bundled with domestic services. Both carriers and their customers agree that treating these two classes of service differently creates massive headaches for all parties by giving rise to additional paperwork,

² AT&T has offered a comprehensive critique of the Order, Petition of AT&T Corp. at 3-8, but also expressly states that it is seeking reconsideration only as to several discrete issues. *Id.* at 9.

³ Petition of AT&T Corp. at 13-16, Petition of the American Petroleum Institute at 1-2, Petition of the SDN Users Association.

⁴ *Petition of the Telecommunications Management Information Systems Coalition* at 2.

⁵ Petition of AT&T Corp. at 9-10 (application of the Order to "casual calling"); Petition of Telco Communications Group at 1-2 (same); Petition of Western Union at 1-2 (application of the Order to consumer messaging services); Petition of Rural Telephone Coalition at 1-2 (geographic rate deaveraging issues); Petition of General Communications, Inc. at 1-2 (same).

complicating negotiations, delaying implementation, and fostering uncertainty.⁶ Petition of AT&T Corp. at 15; see also Petitions of the American Petroleum Institute and SDN Users Association. Carriers and their customers part company, however, in their view of the appropriate remedy. AT&T urges the Commission to permit the tariffing of “mixed” offerings, *i.e.*, those that combine domestic and international services. Petition of AT&T Corp. at 15-16. AT&T says that the continued tariffing of the thousands of mixed service arrangements will cause customers no harm in that there is no more than a “theoretical possibility” that carriers will invoke filed rate doctrine to the detriment of their customers.⁷

The upshot of AT&T’s proposed solution would be the continued tariffing of individually negotiated service arrangements -- a result that no party to this proceeding has endorsed. Indeed, even those carriers who strenuously oppose mandatory detariffing of mass market offerings concede that they do not object to detariffing customer-specific arrangements. Comments of MCI Telecommunications Corporation at 27 (filed April 25, 1996) (stating that MCI’s and its customers’ interests “will be better served” if customer-specific

⁶ For example, a typical AT&T arrangement used to consist of three documents – a contract, the General Regulations of Tariff 12, and a customer-specific Tariff Option. As a result of the Order, AT&T now requires five documents -- a contract, the General Regulations of Tariff 12 for international services, a customer-specific Tariff Option for international services, general terms and conditions for domestic services, and customer-specific terms and conditions for domestic services.

⁷ Petition of AT&T Corp. at 16. As of the time the Order was adopted, the three largest interexchange carriers had nearly 10,000 customer-specific arrangements on file with the Commission as tariffs. The American Petroleum Institute estimates that nearly all such arrangements involving annual commitment of more than \$2-3 million include both domestic and international services. Petition of American Petroleum Institute at 3. We concur.

arrangements are detariffed); Comments of Sprint Communications Company at 5 n.2 (filed April 25, 1996). No party has claimed that any carrier has market power as to these services. Based on the record in this case, the statutory criteria for forbearance have been met with respect to mixed service offerings, and the Commission should subject such offerings to mandatory forbearance. See Petition of American Petroleum Institute at 6-9.

Second, we previously noted in our Petition for Partial Reconsideration and Clarification that there may be confusion in the marketplace about the intent of the Order. Some confusion is inevitable whenever there is a substantial change in the regulatory scheme governing a multi-billion dollar industry that touches the lives of all of us.⁸ Recent developments suggest, however, that carriers may themselves be creating confusion in a way that could undermine a core purpose of the Order.

Earlier this month, MCI opened a so-called "Tariff Reference Room" in Washington D.C. at which members of the public can examine or

⁸ We don't mean to overstate the degree of confusion in the marketplace. The industry trade press has sought to accurately disseminate information about the Order. In fact, the carriers may be more concerned that their customers are accurately reading the Order (and insisting on the rights conferred therein) than they are about misconceptions. For example, in support of its claim for prompt judicial action on its appeal of the Order, MCI recently told the court (with alarm) that a consultant has advised customers with long-term service arrangements to "demand that their contracts be 'fixed' at the moment their current tariffs are canceled, such that any changes after that date which may be materially different from the 'fixed' contract would provide the customers with a right to terminate their service agreements." Opposition of MCI to the Federal Communications Commission's Motion to Hold in Abeyance, Affidavit of Donald J. Elardo ¶ 8, Case No. 96-1459 (D.C. Cir. filed January 13, 1997). In other words, MCI believes that carriers will suffer harm unless they can unilaterally make material changes to the terms of the contracts they have negotiated with their customers. Of course, one of the Commission's purposes in adopting the Order was to "serve the public interest by preserving reasonable commercial expectations and protecting consumers." Order ¶ 55.

purchase (for 25¢ a page) a copy of MCI's "Domestic Price Guide." Attached to these Comments is a copy of the first ten pages of that document as it was provided on January 24; they are representative of the entire document. The cover page states that the document "is being filed" in accordance with the Order, and that **"the terms and conditions . . . reflected in the Guide constitute a tariff"** that is being maintained at MCI's offices instead of those of the Commission. (emphasis supplied) Of course, MCI's Domestic Price Guide is *not* a tariff. It is a compendium of one-or-two-page summaries of the prices for domestic interstate interexchange services that have been negotiated with individual customers. But MCI's description of this document as a "tariff" and its statement that the document has been "filed" in a "Tariff Reference Room" was clearly intended to create a strong (and inaccurate) impression that the document has official status, is not negotiable, and is alterable by the carrier at any time.⁹

We again urge the Commission to clarify that the Order is not intended to preserve the *unfair advantage* that carriers have enjoyed under the tariff regime, but to *eliminate* the filed tariff doctrine and thus "serve the public interest by preserving reasonable commercial expectations and protecting consumers." Order ¶ 55.

⁹ MCI has also insisted that the Domestic Price Guide be incorporated by reference into customer contracts. In one recent instance, MCI's negotiating team could neither supply a copy of the Guide nor give the prospective customer an accurate description of its contents. The team initially assured the customer that the Guide replicated the general terms and conditions in MCI's tariffs on file with the Commission. As is evident from Attachment A, that representation was erroneous, and MCI later conceded as much to the customer.

CONCLUSION

For the reasons stated, the Commission should clarify or partially reconsider its Order -- for the purpose of strengthening its principal deregulatory thrust, not weakening it.

Respectfully submitted,



Ellen G. Block

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Counsel for the Ad Hoc Telecommunications
Users Committee, the California Bankers
Clearing House Association, the New York
Clearing House Association, ABB Business
Services, Inc. and The Prudential Insurance
Company of America

Dated: January 28, 1997

DOMESTIC PRICE GUIDE

THIS DOMESTIC PRICE GUIDE IS BEING FILED AND MAINTAINED IN ACCORDANCE WITH A REQUIREMENT ISSUING FROM THE FEDERAL COMMUNICATIONS COMMISSION (FCC), WHICH POSSESSES REGULATORY AUTHORITY OVER THE SERVICES COVERED IN THE GUIDE. THE TERMS AND CONDITIONS, INCLUDING PRICING, REFLECTED IN THE GUIDE CONSTITUTE A TARIFF THAT IS BEING PUBLISHED AND MAINTAINED BY MCI AT ITS OWN PREMISES, AS DISTINCT FROM THOSE OF THE FCC AT 1919 M STREET, NW, WASHINGTON, DC 20554. THIS TARIFF OR GUIDE MAY BE MODIFIED BY MCI FROM TIME TO TIME ON ONE DAY'S NOTICE, AND EACH SUCH MODIFICATION SHALL BE DEEMED TO BE BINDING ON AFFECTED CUSTOMERS.

THIS GUIDE CONTAINS THE TERMS AND CONDITIONS, INCLUDING PRICES, APPLICABLE TO DOMESTIC SERVICE COMPONENTS THAT ARE PART OF THE SPECIAL CUSTOMER ARRANGEMENTS (SCAS) DEFINED AND DESCRIBED IN SECTION B-17 OF MCI TARIFF FCC NO. 1, WHICH IS FILED AND MAINTAINED ON FCC PREMISES.

EACH SCA OPTION CONTAINED IN THIS DOMESTIC PRICE GUIDE WILL HAVE ITS SAME NUMBERED COUNTERPART IN THE FCC TARIFF WHENEVER INTERNATIONAL SERVICE CONSTITUTES A PART OF THE OVERALL OFFERING. WHEN AN SCA OPTION CONSISTS EXCLUSIVELY OF DOMESTIC SERVICE, THIS GUIDE SHALL ESTABLISH ALL THE TERMS AND CONDITIONS, INCLUDING PRICING, FOR THE ENTIRE OFFERING.

SPECIAL CUSTOMER ARRANGEMENT OPTIONSSCA TYPE 1OPTION NO. 1223

1. Term and Renewal Options: Item 1 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the Federal Communications Commission (FCC) at 1919 M Street, N.W., Washington DC 20554 applies.
2. Description of Service: Item 2 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
3. Minimum Volume Requirement: Item 3 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
4. Rates and Charges: For pricing, unless otherwise noted, rates and charges (including taxes) as stated in MCI Tariff FCC No. 1 on file with the FCC apply.

- 4.1 Vnet: The Customer will be charged the following per minute rates for domestic Vnet usage, based on call type.

<u>Call Type</u>	<u>Rate</u>
Dedicated/Dedicated	\$0.0600
Dedicated/Switched	0.0795
Switched/Dedicated	0.0795
Switched/Switched	0.1100

- 4.2 MCI Vision: The Customer will be charged the following per minute rates for domestic MCI Vision Inbound 800 Service usage using Dedicated Line (800 DAL) or Business Line (800 BL) termination, based on termination type.

<u>Termination Type</u>	<u>Rate</u>
800 DAL	\$0.0805
800 BL	0.1120

- 4.3 networkMCI Conferencing: The Customer will be charged \$0.35 per minute per bridge port (including set-up fees) for networkMCI Conferencing usage.
5. Volume Discounts: If any discounts apply, they will be as set forth in the same numbered SCA Type and Option contained in MCI Tariff FCC No. 1 on file with the FCC.
6. Classifications, Practices and Regulations: Item 6 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
7. Availability: Service under this Option is available to Customers ordering service within 30 days after the effective date of the Option on file with the FCC.

EFFECTIVE: January 4, 1997
ISSUED BY: K. M. Richardson
Sr. Manager, Federal Tariffs
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

SPECIAL CUSTOMER ARRANGEMENT OPTIONSSCA TYPE 1OPTION NO. 1224

1. Term and Renewal Options: Item 1 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the Federal Communications Commission (FCC) at 1919 M Street, N.W., Washington DC 20554 applies.
2. Description of Service: Item 2 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
3. Minimum Volume Requirement: Item 3 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
4. Rates and Charges: For pricing, unless otherwise noted, rates and charges (including taxes) as stated in MCI Tariff FCC No. 1 on file with the FCC apply.
 - 4.1 MCI Vision: The Customer will be charged the following per minute rates for domestic MCI Vision usage, based on call type.

<u>Call Type</u>	<u>Rate</u>
Dedicated/Dedicated	\$0.0680
Dedicated/Switched	0.0715
Switched/Dedicated	0.0715
Switched/Switched	0.1090

The Customer will be charged the following per minute rates for domestic MCI Vision Inbound 800 Service usage using Dedicated Line (800 DAL) or Business Line (800 BL) termination, based on termination type.

<u>Termination Type</u>	<u>Rate</u>
800 DAL	\$0.0715
800 BL	0.1090

5. Volume Discounts: If any discounts apply, they will be as set forth in the same numbered SCA Type and Option contained in MCI Tariff FCC No. 1 on file with the FCC.
6. Classifications, Practices and Regulations: Item 6 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
7. Availability: Service under this Option is available to Customers ordering service within 30 days after the effective date of the Option on file with the FCC.

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SPECIAL CUSTOMER ARRANGEMENT OPTIONSSCA TYPE 1OPTION NO. 1225

1. Term and Renewal Options: Item 1 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the Federal Communications Commission (FCC) at 1919 M Street, N.W., Washington DC 20554 applies.
2. Description of Service: Item 2 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
3. Minimum Volume Requirement: Item 3 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
4. Rates and Charges: For pricing, unless otherwise noted, rates and charges (including taxes) as stated in MCI Tariff FCC No. 1 on file with the FCC apply.

- 4.1 MCI Vision: The Customer will be charged the following per minute rates for domestic MCI Vision and MCI Vision Card Power Rate usage, based on call type and rate period:

<u>Call Type</u>	<u>Business Day</u>	<u>Non-Business Day</u>
Dedicated/Dedicated	\$0.0620	\$0.0420
Dedicated/Switched	0.0750	0.0625
Switched/Dedicated	0.0750	0.0625
Switched/Switched	0.1125	0.0980

In addition to the per minute rates set forth above, the Customer will be charged a \$0.35 per call surcharge (excluding calls to Directory Assistance) for domestic MCI Vision Card Power Rate usage to the United States, Puerto Rico, U.S. Virgin Islands and Canada.

The Customer will be charged the following per minute rates for domestic MCI Vision Inbound 800 Service Power Rate usage using Dedicated Line (800 DAL) or Business Line (800 BL) termination, based on termination type and rate period:

<u>Termination Type</u>	<u>Business Day</u>	<u>Non-Business Day</u>
800 DAL	\$0.0750	\$0.0635
800 BL	0.1125	0.0990

- 4.2 networkMCI Conferencing: The Customer will be charged \$0.39 per minute per bridge port (including set-up fees) for Unattended Meet-Me Service usage.
5. Volume Discounts: If any discounts apply, they will be as set forth in the same numbered SCA Type and Option contained in MCI Tariff FCC No. 1 on file with the FCC.
 6. Classifications, Practices and Regulations: Item 6 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
 7. Availability: Service under this Option is available to Customers ordering service within 30 days after the effective date of the Option on file with the FCC.

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SPECIAL CUSTOMER ARRANGEMENT OPTIONSSCA TYPE 1OPTION NO. 1226

1. Term and Renewal Options: Item 1 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the Federal Communications Commission (FCC) at 1919 M Street, N.W., Washington DC 20554 applies.
2. Description of Service: Item 2 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
3. Minimum Volume Requirement: Item 3 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
4. Rates and Charges: For pricing, unless otherwise noted, rates and charges (including taxes) as stated in MCI Tariff FCC No. 1 on file with the FCC apply.

- 4.1 Vnet: The Customer will be charged the following per minute rates for domestic Vnet and Vnet Card usage, based on call type.

<u>Call Type</u>	<u>Rate</u>
Dedicated/Dedicated	\$0.0786
Dedicated/Switched	0.1215
Switched/Dedicated	0.1215
Switched/Switched	0.1786

In addition to the per minute rates set forth above, the Customer will be charged a \$0.25 per call surcharge on domestic Vnet Card usage.

- 4.2 MCI 800 Service: The Customer will be charged the following per minute rates for domestic MCI 800 Service usage using Dedicated Line (800 DAL) or Business Line (800 BL) termination, based on termination type.

<u>Termination Type</u>	<u>Rate</u>
800 DAL	\$0.1215
800 BL	0.1786

- 4.3 networkMCI Conferencing: The Customer will be charged the following rates per minute per bridge port (including set-up fees) for networkMCI Conferencing usage.

<u>Service</u>	<u>Rate</u>
Attended Meet-Me Service	\$0.30
Unattended Meet-Me Service	0.35

5. Volume Discounts: If any discounts apply, they will be as set forth in the same numbered SCA Type and Option contained in MCI Tariff FCC No. 1 on file with the FCC.
6. Classifications, Practices and Regulations: Item 6 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
7. Availability: Service under this Option is available to Customers ordering service within 30 days after the effective date of the Option on file with the FCC.

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SPECIAL CUSTOMER ARRANGEMENT OPTIONSSCA TYPE 1OPTION NO. 1227

1. Term and Renewal Options: Item 1 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the Federal Communications Commission (FCC) at 1919 M Street, N.W., Washington DC 20554 applies.
2. Description of Service: Item 2 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
3. Minimum Volume Requirement: Item 3 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
4. Rates and Charges: For pricing, unless otherwise noted, rates and charges (including taxes) as stated in MCI Tariff FCC No. 1 on file with the FCC apply.

- 4.1 Vnet: The Customer will be charged the following per minute rates for domestic Vnet and Vnet Card usage, based on call type.

<u>Call Type</u>	<u>Rate</u>
Dedicated/Dedicated	\$0.0699
Dedicated/Switched	0.0800
Switched/Dedicated	0.0800
Switched/Switched	0.1256

- 4.2 MCI 800 Service: The Customer will be charged the following per minute rates for domestic MCI 800 Service usage using Dedicated Line (800 DAL) or Business Line (800 BL) termination, based on termination type.

<u>Termination Type</u>	<u>Rate</u>
800 DAL	\$0.0800
800 BL	0.1256

- 4.3 networkMCI Conferencing: The Customer will be charged the following rates per minute per bridge port (including set-up fees) for networkMCI Conferencing usage.

<u>Service</u>	<u>Rate</u>
Dial-Out Service	\$0.36
Personal 800 Meet-Me Service	0.36
800 Meet-Me Service	0.36
Toll Meet-Me Service	0.22
Unattended Meet-Me Service	0.30

5. Volume Discounts: If any discounts apply, they will be as set forth in the same numbered SCA Type and Option contained in MCI Tariff FCC No. 1 on file with the FCC.
6. Classifications, Practices and Regulations: Item 6 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
7. Availability: Service under this Option is available to Customers ordering service within 30 days after the effective date of the Option on file with the FCC.

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SPECIAL CUSTOMER ARRANGEMENT OPTIONSSCA TYPE 1OPTION NO. 1228

1. Term and Renewal Options: Item 1 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the Federal Communications Commission (FCC) at 1919 M Street, N.W., Washington DC 20554 applies.
2. Description of Service: Item 2 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
3. Minimum Volume Requirement: Item 3 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
4. Rates and Charges: For pricing, unless otherwise noted, rates and charges (including taxes) as stated in MCI Tariff FCC No. 1 on file with the FCC apply.

- 4.1 Vnet: The Customer will be charged the following per minute rates for domestic Vnet and Vnet Card usage, based on call type.

<u>Call Type</u>	<u>Rate</u>
Dedicated/Dedicated	\$0.0732
Dedicated/Switched	0.0779
Switched/Dedicated	0.0779
Switched/Switched	0.1148

In addition to the rates set forth above, the Customer will be charged a \$0.25 per call surcharge on domestic Vnet Card usage.

- 4.2 MCI 800 Service: The Customer will be charged the following per minute rates for domestic MCI 800 Service usage using Dedicated Line (800 DAL) or Business Line (800 BL) termination, based on termination type.

<u>Termination Type</u>	<u>Rate</u>
800 DAL	\$0.0779
800 BL	0.1148

5. Volume Discounts: If any discounts apply, they will be as set forth in the same numbered SCA Type and Option contained in MCI Tariff FCC No. 1 on file with the FCC.
6. Classifications, Practices and Regulations: Item 6 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
7. Availability: Service under this Option is available to Customers ordering service within 30 days after the effective date of the Option on file with the FCC.

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SPECIAL CUSTOMER ARRANGEMENT OPTIONSSCA TYPE 1OPTION NO. 1229

1. Term and Renewal Options: Item 1 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the Federal Communications Commission (FCC) at 1919 M Street, N.W., Washington DC 20554 applies.
2. Description of Service: Item 2 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
3. Minimum Volume Requirement: Item 3 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
4. Rates and Charges: For pricing, unless otherwise noted, rates and charges (including taxes) as stated in MCI Tariff FCC No. 1 on file with the FCC apply.

- 4.1 Vnet: In lieu of any other tariffed rates or discounts, the Customer will be charged the following per minute rates for domestic Vnet usage, based on call type.

<u>Call Type</u>	<u>Rate</u>
Dedicated/Dedicated	\$0.0761
Dedicated/Switched	0.0925
Switched/Dedicated	0.0925
Switched/Switched	0.1350

- 4.2 MCI 800 Service: In lieu of any other tariffed rates or discounts, the Customer will be charged the following per minute rates for domestic MCI 800 Service usage using Dedicated Line (800 DAL) or Business Line (800 BL) termination, based on termination type.

<u>Termination Type</u>	<u>Rate</u>
800 DAL	\$0.0938
800 BL	0.1400

- 4.3 networkMCI Conferencing: In lieu of any other tariffed rates or discounts, the Customer will be charged the following rates per minute per bridge port (including set-up fees) for networkMCI Conferencing usage.

<u>Service</u>	<u>Rate</u>
Attended	\$0.34
Unattended	0.31

MCI TELECOMMUNICATIONS CORPORATION

DOMESTIC PRICE GUIDE

PAGE 2 OF 2

SPECIAL CUSTOMER ARRANGEMENT OPTIONS

SCA TYPE 1

OPTION NO. 1229

5. Volume Discounts: If any discounts apply, they will be as set forth in the same numbered SCA Type and Option contained in MCI Tariff FCC No. 1 on file with the FCC.
6. Classifications, Practices and Regulations: Item 6 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
7. Availability: Service under this Option is available to Customers ordering service within 30 days after the effective date of the Option on file with the FCC.

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SPECIAL CUSTOMER ARRANGEMENT OPTIONSSCA TYPE 1OPTION NO. 1230

1. Term and Renewal Options: Item 1 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the Federal Communications Commission (FCC) at 1919 M Street, N.W., Washington DC 20554 applies.
2. Description of Service: Item 2 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
3. Minimum Volume Requirement: Item 3 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
4. Rates and Charges: For pricing, unless otherwise noted, rates and charges (including taxes) as stated in MCI Tariff FCC No. 1 on file with the FCC apply.

- 4.1 MCI Vision: The Customer will be charged the following per minute rates for domestic MCI Vision usage, based on call type.

<u>Call Type</u>	<u>Rate</u>
Dedicated/Dedicated	\$0.0647
Dedicated/Switched	0.0712
Switched/Dedicated	0.0712
Switched/Switched	0.1040

The Customer will be charged the following per minute rates for domestic MCI Vision Inbound 800 Service usage using Dedicated Line (800 DAL) or Business Line (800 BL) termination, based on termination type:

<u>Termination Type</u>	<u>Rate</u>
800 DAL	\$0.0712
800 BL	0.1040

- 4.2 networkMCI Conferencing: The Customer will be charged the following rates per minute per bridge port (including set-up fees) for networkMCI Conferencing usage.

<u>Service</u>	<u>Rate</u>
800 Meet-Me Service	\$0.39
Toll Meet-Me Service	0.39
Unattended Meet-Me Service	0.39

5. Volume Discounts: If any discounts apply, they will be as set forth in the same numbered SCA Type and Option contained in MCI Tariff FCC No. 1 on file with the FCC.
6. Classifications, Practices and Regulations: Item 6 of the same numbered SCA Type and Option as set forth in MCI Tariff FCC No. 1 on file with the FCC applies.
7. Availability: Service under this Option is available to Customers ordering service within 30 days after the effective date of the Option on file with the FCC.

EFFECTIVE: January 4, 1997
ISSUED BY: K. M. Richardson
Sr. Manager, Federal Tariffs
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Certificate of Service

I, Andrew Baer, hereby certify that true and correct copies of the preceding Comments of the Ad Hoc Telecommunications Users Committee on Petitions Reconsideration and Clarification concerning the Commission's Second Report and Order in CC Docket 96-61, were filed this 28th day of January 1997 with the Secretary of the Federal Communications Commission and served this day, via US first class mail, upon the following:

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January 28, 1997